

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :  
:  
v. : No. 2:21-mj-813  
:  
RANDY FRASINELLI, :  
:  
Defendant. :  
:

**UNOPPOSED MOTION TO TRAVEL OUTSIDE OF THE JURISDICTION**

AND NOW, comes the defendant RANDY FRASINELLI, by and through the undersigned counsel, and files the following UNOPPOSED MOTION TO TRAVEL OUTSIDE OF THE JURISDICTION, and in support thereof, states as follows:

1. On Thursday, April 15, 2021, the defendant, RANDY FRASINELLI appeared before this Court in his first appearance pursuant to the Criminal Complaint in this matter, and was released on Unsecured Bond, Dkt. Nos. 10, 11 & 12, subject to certain conditions, at Dkt. No. 13, including the restriction to remain within the confines of the Western District of Pennsylvania.

2. The Defendant would like to travel to Indianapolis, Indiana, leaving this Friday, May 14<sup>th</sup>, and returning to Pittsburgh on or before Monday, May 18<sup>th</sup>, and staying at a local motel there, in order to spend time with a family member at preliminary events for the upcoming Indianapolis Motor Speedway races over Memorial Day.

3. The Defendant therefore seeks this Court's Order to Travel to Indianapolis, Indiana on the dates listed above. He can always be reached by cellphone and through counsel.

4. The United States Attorney's Office has no objection to the Defendant's travel.

WHEREFORE, it is respectfully requested that the defendant, RANDY FRASINELLI, be permitted to travel outside of the jurisdiction, as described more fully herein.

Respectfully submitted,

THE GRAIL LAW FIRM

By: /s/ Efrem M. Grail

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By: /s/ Brian C. Bevan

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*Attorneys for Defendant,  
Randy Frasinelli*

Date: May 11, 2021

## **CERTIFICATE OF SERVICE**

I, EFREM M. GRAIL, ESQUIRE, hereby certify that a true and correct copy of the foregoing **UNOPPOSED MOTION TO TRAVEL OUTSIDE OF THE JURISDICTION** was filed on the date appearing thereon with the Clerk of Court using the CM/ECF system and thereby becoming immediately available to the following:

Jeffrey Bengal, Esquire  
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By:/s/ *Efrem M. Grail*  
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*Attorneys for Defendant,*  
*Randy Frasinelli*